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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of)
)
1998 Biennial Regulatory Review -- Amendment of Parts)
2, 25 and 68 of the Commission's Rules to Further)
Streamline the Equipment Authorization Process for)
Radio Frequency Equipment, Modify the Equipment)
Authorization Process for Telephone Terminal Equipment,)
Implement Mutual Recognition Agreements and Begin)
Implementation of the Global Mobile Personal)
Communications by Satellite (GMPCS) Arrangements)
)

GEN Docket No. 98-68

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JUL 27 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF
LOCKHEED MARTIN CORPORATION

Lockheed Martin Corporation ("Lockheed Martin") hereby submits its Comments in the above-captioned proceeding. Lockheed Martin's Comments address the Commission's proposals for implementation of the Global Mobile Personal Communications by Satellite ("GMPCS") Arrangements and Mutual Recognition Agreements ("MRAs") entered into by the United States.

Lockheed Martin is the licensee of the Astrolink™ System, a Ka-band GSO FSS satellite system that will deploy small, ubiquitous user terminals to provide advanced broadband telecommunications services directly to end users around the globe.¹ Lockheed Martin has also applied for FCC authority to launch and operate three additional satellite systems: (i) the LM-MEO System, an NGSO FSS system operating in Ka-band and V-band frequencies; (ii) the Astrolink-Phase II™ System, a Ka-band GSO FSS system designed to augment the broadband communications capabilities of the Astrolink™ System; and (iii) a GSO FSS/BSS system

¹ Lockheed Martin Corp., Order and Authorization, 12 FCC Rcd 23014 (1997).

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comprised of nine satellites in nine orbit locations that will provide broadband and ultra-broadband services in the V-band.² Like Lockheed Martin's licensed Astrolink™ System, its other proposed satellite systems will deploy small, ubiquitous user terminals to provide advanced satellite telecommunications services directly to end users on a global basis.

Lockheed Martin fully supports the Commission's proposal to implement an interim GMPCS equipment authorization procedure and urges the Commission to develop such facilitative procedures for *all types* of GMPCS terminals. As the Commission recognized in its *Notice of Proposed Rulemaking*, the 1996 World Telecommunications Policy Forum defined GMPCS as "any satellite system, (i.e., fixed or mobile, broadband or narrow-band, global or regional, geostationary or non-geostationary, existing or planned) providing telecommunications services directly to end users from a constellation of satellites."³ By definition, GMPCS includes the advanced satellite communications services to be provided by the licensed Astrolink™ System and Lockheed Martin's other proposed satellite systems. Like the MSS systems that are the focus of the instant proceeding, U.S.-licensed Ka-band and higher band FSS systems would suffer a severe competitive disadvantage if their user terminals were not as easily transportable across national territories as other GMPCS equipment.⁴

² See FCC File No. 51-SAT-P/LA-98 (32) (filed Dec. 22, 1997); FCC File Nos. 39 through 43-SAT-P/LA-98 (filed Dec. 22, 1997); FCC File Nos. 129 through 137-SAT-P/LA-97 (filed Sept. 25, 1997).

³ See Notice of Proposed Rulemaking, GEN Docket No. 98-86 (rel. May 18, 1998) at ¶ 1, n.1 ("*Notice of Proposed Rulemaking*").

⁴ The discussion of GMPCS terminals in the *Notice of Proposed Rulemaking* apparently focuses on MSS equipment because several U.S.-licensed MSS systems are either operational or propose to commence operations in the near future. *Id.* at ¶ 40.

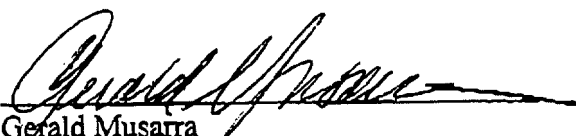
Lockheed Martin understands that the Commission will soon initiate a rulemaking to fully implement the GMPCS Arrangements, including the promulgation of final authorization procedures for all types of GMPCS equipment.⁵ Lockheed Martin urges the Commission to pursue this contemplated rulemaking in a timely manner to ensure that GMPCS authorization procedures will be in place sufficiently in advance of the planned deployment of licensed Ka-band and other proposed U.S. satellite systems. Further, to the extent that implementation of final GMPCS authorization procedures is delayed for any reason, the Commission should clarify that licensed Ka-band systems and other proposed satellite systems can utilize the proposed interim authorization procedures for their GMPCS equipment.

Accordingly, Lockheed Martin supports the rules proposed by the Commission and believes that they should be implemented as expeditiously as possible.

Respectfully submitted,

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⁵ *Id.* at ¶¶ 38-39.

CERTIFICATE OF SERVICE

I, Cynthia S. Shaw, a secretary at the law firm of Dow, Lohnes & Albertson, do hereby certify that on this 27th day of July, 1998, the foregoing "Comments of Lockheed Martin Corporation" were served via hand delivery to the following:

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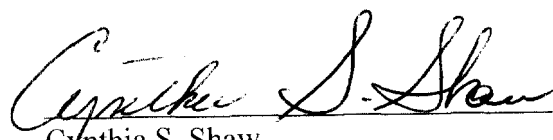
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